UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

| SHERI WADE |) |
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| Plaintiff, |) |
| v. |) Case No. 3:18-cv-00828-MHI |
| INTERWORKS UNLIMITED, INC. |) |
| Defendants. |))) |

MOTION FOR DEFAULT JUDGMENT

Plaintiff Sheri Wade ("Ms. Wade"), by counsel, hereby moves the Court for an entry of default judgment against Defendant Interworks Unlimited Inc. ("Interworks"), pursuant to Rule 55(b) of the Federal Rules of Civil Procedure. Ms. Wade submits the following in support of entry of a default judgment against Interworks.

- 1. Interworks is a non-natural person and is not subject to the potential exceptions to entry of a default judgment applicable to an infant or incompetent or a person in military service or otherwise exempted under the Servicemembers Civil Relief Act (50 U.S.C. App. §521).
- 2. Interworks has not appeared in this action despite having been duly served with the Summons and Complaint in this matter.
- 3. Interworks failed to file a response to the Complaint within the date by which its responsive pleading was due or at any time thereafter, and Interworks has not made an appearance in this action.
- 4. Accordingly, the Clerk of Court made an entry of default on February 19, 2019 (ECF No. 7).

5. Ms. Wade now requests an entry of default judgment against Interworks and her bases for seeking such relief are more particularly stated in her Memorandum in Support of Motion for Default Judgment, which is incorporated herein by reference.

WHEREFORE, Plaintiff requests that this Court enter default judgment against Interworks, and award her any other relief that this Court deems necessary and appropriate.

Respectfully submitted, SHERI WADE

| By: | /s/ | |
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| - | Counsel | |

Jonathan E. Halperin, Esq. (VSB No. 32698) Andrew Lucchetti, Esq. (VSB No. 86631) Halperin Law Center, LLC 5225 Hickory Park Drive, Suite B Glen Allen, VA 23059 Phone: (804) 527-0100 Facsimile: (804) 597-0209 jonathan@hlc.law andrew@hlc.law isaac@hlc.law and

Brody Reid, Esq. (VSB No.75343) Reid Goodwin, PLC 4116 Fitzhugh Avenue Richmond, Virginia 23230 Phone: (804) 415-7800 Facsimile: (804) 415-7560

breid@reidgoodwin.com

Counsel for Plaintiff